

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTEL CORPORATION,

Plaintiff,

v.

VLSI TECHNOLOGY LLC,

Defendant.

Case No: 24-cv-803-CFC

**VLSI TECHNOLOGY LLC’S
NOTICE OF SUBSEQUENT EVENTS**

VLSI respectfully submits this Notice of Subsequent Events to apprise the Court of further progress in the parties’ Western District of Texas litigation on Intel’s license defense since the close of briefing on VLSI’s Motions to Dismiss, Transfer, and Stay, including the Western District of Texas’s recent order setting trial for May 27–28, 2025. Ex. A (Welch email). *Compare, e.g.*, D.I. 26 (Intel’s MTD Opp.) at 8 (“Fact discovery is ongoing . . . and no trial date is set.”)

On October 29, the Western District of Texas held a hearing to resolve the remaining discovery disputes between the parties regarding the license defense. Ex. B (W.D. Tex. D.I. 854). Following the hearing, the Western District of Texas instructed the parties to meet and confer regarding a schedule for resolving the license defense. *Id.* at 11–12. The parties agreed to the following schedule:

Event	Deadlines
Close of Fact Discovery	November 22, 2024
Opening Expert Reports	December 20, 2024
Rebuttal Expert Reports	January 17, 2025
Close of Expert Discovery	January 29, 2025
Dispositive Motions	February 7, 2025
Dispositive Motion Responses	February 21, 2025
Dispositive Motion Replies	February 28, 2025
(Proposed) Dispositive Motions Hearing	March 6, 2025
Trial (Set by Court)	May 27–28, 2025

See Ex. C (Ransom Email).

Under the agreed schedule, Intel deposited VLSI's 30(b)(6) designee on November 20–21 regarding license defense-related matters, and fact discovery closed on November 22. Ex. C.

Dated: December 2, 2024

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)

Michael J. Farnan (Bar No. 5165)

919 N. Market St., 12th Floor

Wilmington, DE 19801

Telephone : (302) 777-0300

Fax : (302) 777-0301

bfarnan@farnanlaw.com

mfarnan@farnanlaw.com

Morgan Chu (admitted *pro hac vice*)

Benjamin Hattenbach (admitted *pro hac vice*)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067
Telephone: (310) 277-1010
mchu@irell.com
bhatenbach@irell.com

Attorneys for Defendant VLSI Technology LLC